AMENDMENTS TO THE DRAWINGS

Please replace Figures 3, 5, 16, and 20 with the drawing replacement sheets filed concurrently with this Amendment. The amendments to the drawings are discussed in the Remarks section of this paper. The amendments do not introduce any new matter.

REMARKS

Introductory Comments

In the Office Action: (1) the drawings continue to be objected to under 37 CFR 1.83(a) and 37 CFR 1.84(p)(5); claims 1, 2, 4, 7-16, 18, 21-32, 34, 37-48, 50, and 53-72 were rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 5,892,905 to Brandt et al. (hereinafter "Brandt") in view of U.S. Patent No. 6,526,570 to Click, Jr. et al. (hereinafter "Click"); claims 3, 5, 17, 19, 33, 35, 49, and 51 were rejected under 35 U.S.C. §103(a) as being unpatentable over Brandt and Click in view of Smith, "Protocol Work Melds Storage Methods," *Network World*, 13 September 1999, p. 67 (hereinafter "Smith"); and claims 6, 20, 36, and 52 were rejected under U.S.C. §103(a) as being unpatentable over Brandt and Click in view of U.S. Patent No. 6,397,191 to Notani et al. (hereinafter "Notani").

In Applicants' first response to the final Office Action, which Applicants filed on December 17, 2004, Applicants requested entry of amendments to the claims, including an amendment to independent claim 65 to further articulate novel aspects and an amendment to claim 21 to correct typographical errors. Applicants also submitted replacement drawings for Figures 3, 5, 16, and 20.

In the Advisory Action of January 11, 2005, the Examiner found Applicants' arguments concerning independent claims 1 and 31, as presented in the first response to the final Office Action, to be convincing (Advisory Action, page 3). However, the Examiner determined that the proposed amendments to the claims would not be entered because the amendment to independent claim 65 would require further consideration and/or searching (Advisory Action, pages 2 and 3). The Examiner also indicated that the original drawing sheets were mistakenly filed rather than the intended replacement drawing sheets (Advisory Action, page 3).

Because the Examiner has not entered the proposed amendments to the claims, Applicants are filing this Amendment contemporaneously with a Request for Continued Examination (RCE) pursuant to 37 C.F.R. §1.114. Applicants hereby instruct that the amendments presented in Applicants' first response to the final Office Action, filed December 17, 2004, not be entered into the record because the same amendments are included in this Amendment. In this Amendment, Applicants have amended independent claim 65 to further articulate novel aspects. Claim 21 has been amended simply to correct typographical errors. Replacement drawings sheets for Figures 3, 5, 16, and 20 have been submitted. No new matter has been added, and no claims have been canceled. Upon entry of

these amendments, claims 1-72 remain presently pending in this application. Claims 1, 31, and 65 are independent claims. Applicants respectfully request reconsideration of claims 1-72 in light of the amendments to the claims and for the reasons discussed below.

Objections to the Drawings

In the Office Action, the Examiner did not withdraw several of the objections to the drawings made in the First Office Action (dated February 26, 2004) because the corrected drawings submitted with the Amendment filed July 1, 2004 were the same as the original drawings (page 2 of the Office Action). In the Advisory Action of January 11, 2005, the Examiner pointed out that that the original Figures 3, 5, 16, and 20 were submitted with Applicant's first response to the final Office Action, rather than the intended replacement drawing sheets. Appropriate replacement sheets are being filed concurrently with this Amendment to overcome the remaining objections to the drawings by revising Figures 3, 5, 16, and 20.

In the replacement drawing sheets, Fig. 5 has been amended so that "Worklist View – User BEN" is now labeled "59" rather than "58" in order to conform to 37 CFR 1.84(p)(4). The specification was previously amended to reflect the use of "59" to indicate "Worklist View – User BEN" as shown in the replacement sheet for Fig. 5. Reference "72," which previously indicated the "User" link, has been removed from Fig. 5 to conform to 37 CFR 1.84(p)(5).

Fig. 16 has been amended to include "192" as a label for the "columns" in order to bring the drawings into conformity with 37 CFR 1.83(a).

In Fig. 3, per the request of the Examiner, previous designation "44-15" has been amended to "44"; "Process Instance Creation UI" has been amended to "Process Instance Activity UI"; "42-9, -10, -11, -12" has been amended to "42-9, -10, -11, -12, -13"; and the contents of the center box have been made legible and read "Worklist View."

In Fig. 20, "Process Instance Creation UI" has been amended to "Process Instance Activity UI" per the suggestion of the Examiner.

The proposed amendments to the drawings are fully supported in the specification as filed. Based on the amendments to the drawings reflected in the replacement drawing sheets, it is respectfully suggested that Applicants have overcome the objections to the drawings.

Rejection of claims 1-72 under 35 U.S.C. §103(a)

For the reasons discussed below, the Office Action fails to establish a *prima facie*

case of obviousness against claims 1-72. A *prima facie* case of obviousness requires: (1) a suggestion or motivation to modify or combine the reference teachings; (2) a reasonable expectation of success; and (3) a teaching or suggestion in the prior art references of all of the claim limitations (MPEP 2143). The Office Action does not satisfy all of these requirements.

A.   Independent Claim 31

Independent claim 31 was rejected under 35 U.S.C. §103(a) as being unpatentable over Brandt in view of Click (pages 3-6 of the Office Action). However, the Office Action fails to establish a *prima facie* case of obviousness against independent claim 31 for at least two separate reasons: (1) Brandt and Click, taken alone or in combination, do not teach or suggest every claim limitation recited in claim 31; and (2) one of ordinary skill in the art would not have been motivated to combine Brandt and Click as asserted by the Examiner.

1.   Brandt and Click do not teach every claim limitation of claim 31

The Examiner admits on pages 4 and 5 of the Office Action that Brandt does not teach the following claim limitations recited in claim 31:

> interfacing at least one second workflow platform independent object with the at least one first workflow platform dependent object, wherein the <u>at least one second workflow platform independent object is configured to provide input data received from the client server to the at least one first workflow platform dependent object and to receive output data provided by the workflow management system from the at least one first workflow platform dependent object</u>; (Emphasis added.)

The Examiner then asserts that Click cures the admitted deficiencies of Brandt. However, Click does not teach or suggest every element of the above-highlighted limitations of claim 31. For example, on page 5 of the Office Action, the Examiner relies upon the platform-dependent object code and the platform-independent object code taught in Click as disclosing the claimed first workflow platform dependent object and second workflow platform independent object, respectively. However, the platform-dependent and platform-independent object codes taught in Click have completely different functions from what is recited in the claim limitation of a second workflow platform <u>independent</u> object being configured to <u>provide input data received from a client server to</u> at least one first workflow platform <u>dependent</u> object. As taught in Click, the only user-defined or selected input is in the form of an architecture design (AD) file 204 (col. 5, lines 13-19). The AD file 204 is used to compile platform <u>dependent</u> object code without any intervention or interfacing by the platform-independent object code (col. 5, lines 50-67). Thus, Click fails to teach or suggest the claim limitation of a second workflow platform <u>independent</u> object being

configured to <u>provide input data received from a client server</u> to a first workflow platform <u>dependent</u> object because the platform-independent object code of Click does not provide any data from AD input file to the platform-dependent object code.

In addition, Click does not contain any teaching of the claim limitation of a workflow platform <u>independent</u> object being configured to <u>receive output data provided by a workflow management system from a workflow platform dependent object</u>. While the Examiner relies upon the platform-dependent and independent object codes disclosed in Click to reject claim 31, there is no teaching in Click of either of the object codes receiving <u>output</u> data from a workflow management system for output to a user because the object codes of Click are limited to being compiled together to form a target platform object code (e.g., an executable). The one-way arrow pointing to the target platform object code of Figure 2 of Click illustrates that the compiler system of Click is limited to a one-way data flow for generating object code that is readable by the target platform. A one-way data flow does not teach or suggest the two-way data flow recited in the claim limitation of "at least one second workflow platform independent object [being] configured to <u>provide input data</u> received from the client server to the at least one first workflow platform dependent object <u>and to receive output data</u> provided by the workflow management system from the at least one first workflow platform dependent object" (Emphasis added). Because the combination of Brandt and Click does not teach or suggest every claim limitation associated with the platform-independent and platform-dependent objects as recited in independent claim 31, the Office Action fails to establish a *prima facie* case of obviousness against claim 31 (MPEP 2143).

2. One of ordinary skill in the art would not have been motivated to combine Brandt and Click

The Office Action also fails to establish a *prima facie* case of obviousness against independent claim 31 for a separate and independent reason: one of ordinary skill in the art would not have been motivated to combine Click and Brandt as asserted by the Examiner. In particular, the references do not contain any suggestion or motivation for the asserted combination. On pages 5 and 6 of the Office Action, the Examiner asserts that it would have been obvious to one of ordinary skill in the art at the time of Applicants' invention to use the platform-specific compiler of Click with the teachings of Brandt because Brandt teaches an application gateway that facilitates a response to a request by <u>formatting appropriate commands</u> for a software application. However, the formatting of commands taught in Brandt is for the purpose of forwarding user requests (e.g., HTML variables) from a World Wide Web (WWW) interface (e.g., a web browser) at a client computer to a software

application at a server computer. This has nothing to do with compilers, which are programs that transform source code into machine language (e.g., binary (object) code) that can be directly loaded and executed by a computing device (see col. 2, lines 46-49 of Click).

The compiler taught in Click is a multi-platform compiler designed to automate the porting of software programs from one computer platform type to another (e.g., an X86 platform to a SPARC platform) by building a platform-dependent compiler using a user-defined AD file 204 that contains descriptors of a platform's architecture (col. 4, lines 25-53). From the AD file 204, the system of Click generates software code that is specific to a target platform (404 of Figure 4). The platform-specific code is then combined with platform-independent code to compile software object code that can be executed on the target platform (408 and 410 of Figure 4). Compilers, including the multi-platform compiler disclosed in Click, transform source code into machine-readable code that can be executed by a machine. As such, compilers are entirely different tools from the system taught in Brandt for formatting a web interface's HTML input for use by a software application (see CGI and FMIG of Figure 4 of Brandt). Click's compiler for porting software between platforms and Brandt's formatting of commands received from a user-interface for presentation to a software application are distinct and separate areas of computing that would not have been an obvious combination to one of ordinary skill in the art.

Other assertions in the Office Action for combining Click and Brandt similarly would not have motivated one skilled in the art to combine the references. In particular, the Examiner appears to rely upon very broad and generalized goals as motivations or suggestions for combining Click and Brandt. Firstly, the Examiner asserts that the teachings of both Click and Brandt are designed to increase productivity and efficiency (page 6 of the Office Action). Secondly, the Examiner asserts that the quality of decision-making within an enterprise will be optimized by having access to different application programs via the World Wide Web (WWW). Applicants cannot ascertain from the Office Action how such broad goals would somehow motivate one of ordinary skill in the art to combine the Click and Brandt references, which are directed to unrelated areas of computing. Neither Click nor Brandt includes any mention of decision-making. Click is directed to building compilers for different computer architectures, and Brandt is directed to providing a common interface for communicating with a software application via the World Wide Web (WWW), neither of which has anything to do with decision-making.

Moreover, one of ordinary skill in the art would not have been motivated to combine Click and Brandt because the references are divergent and teach away from one another.

While Brandt is directed to providing a common user-interface that allows access to software applications via the World Wide Web (Abstract of Brandt), Click is contrastingly directed to compiling platform-specific software applications for porting between different computer systems (col. 1, lines 35-38 and col. 3, lines 9-17 of Click). In other words, Brandt seeks to provide a common access to a software application, thereby allowing users to access a software application without installing and running the software application on local client computers. In contrast, the software porting taught by Click encourages compiling software applications for different computer architectures so that the software application can be distributed and run ("ported") on different computer architectures (col. 1, lines 35-38 and col. 3, lines 9-17 of Click). Thus, the directions of Brandt and Click are divergent, and, without impermissible hindsight, one skilled in the art would not have been motivated to combine these divergent references as suggested by the Examiner.

For any one of the foregoing reasons, the Office Action fails to establish a *prima facie* case of obviousness against independent claim 31, and Applicants respectfully request that the Examiner withdraw the rejection of the claim, which is in condition for allowance. Claims 32-64 and 72 are also in condition for allowance as dependents of claim 31.

B. Independent Claim 1

On page 9 of the Office Action, the Examiner rejected independent claim 1 based on the same rejections used to reject independent claim 31. Claim 1 recites similar limitations to those discussed above in relation to claim 31. Therefore, each argument presented above for the patentability of claim 31 applies equally for claim 1, and Applicants respectfully request that the Examiner withdraw the rejection of independent claim 1, which is in condition for allowance. Claims 2-30 and 71 are also in condition for allowance as dependents of claim 1.

C. Independent Claim 65

Independent claim 65 was rejected under 35 U.S.C. §103(a) as being unpatentable over Brandt in view of Click (pages 9-12 of the Office Action). Inasmuch as the Examiner relies upon both Brandt and Click to reject independent claim 65, the Office Action fails to establish a *prima facie* case of obviousness against claim 65 because, as discussed above in relation to claim 31, one of ordinary skill in the art would not have been motivated to combine Brandt and Click. Nevertheless, other reasons for the patentability of claim 65 exist, namely that Click and Brandt do not teach or suggest every claim limitation recited in claim 65.

On pages 9-12 of the Office Action, the Examiner relies upon Brandt's teachings of users accessing a car rental application to rent a car to reject independent claim 65. The

Examiner interprets the car rental example of Brandt as a workflow management system. Applicants respectfully disagree with the Examiner's interpretation of Brandt's car rental software to be a workflow management system, especially when the claim limitation of a workflow management system is read in the context of the entire claim and the specification. A workflow management system provides tools for planning and managing activities and resources involved in getting tasks done, as well as tools for tracking the flow of work performed on tasks (page 1, lines 9-14 of Applicants' Specification). Moreover, a workflow management system, as claimed, will be readily understood by those skilled in the art to not include a simple web-based car rental order form.

To better clarify the claim limitation of the workflow management system, Applicants have amended claim 65 to recite the claim limitation that "the process corresponds with a function of the workflow management system and defines one or more tasks, the workflow management system being configured to assign the tasks to users and to monitor work performed on the tasks" (amendment emphasized). The car rental process disclosed in Brandt does not teach or suggest defining tasks, assigning tasks to users, or monitoring work performed on tasks. Click fails even to mention a workflow management system. Because Brandt and Click, taken alone or in combination, do not teach the claim limitation of the workflow management system being configured to assign tasks to users and to monitor work performed on the tasks, Applicants respectfully request that the Examiner withdraw the rejection of independent claim 65, which is in condition for allowance. Claims 66-70 are also in condition for allowance as dependents of independent claim 65.

D.   Separate Patentability of Dependent Claims

In view of the patentability of independent claims 1, 31 and 65, it is respectfully submitted that claims 2-30, 32-64, and 66-72 are in condition for allowance as dependents of the three independent claims. Nevertheless, the dependent claims recite claim limitations that are independently patentable over the prior art of record. A discussion of representative examples of such patentable claim limitations follows.

1.   Claims 4, 18, 34, and 50

Claims 4, 18, 34, and 50 were rejected under 35 U.S.C. §103(a) as being unpatentable over Brandt in view of Click (pages 6 and 9 of the Office Action). With respect to claim 34, the Examiner continues to rely upon Brandt's teaching of a software application generating values for variables to reject the claim limitation of causing a predefined protocol page to be presented to a user for performing work on a task (page 6 of the Office Action). Applicants respectfully submit that Brandt does not teach this claim limitation because the generation of

requested variables taught by Brandt is <u>performed by software applications</u>, which is entirely different from <u>presenting</u> a predefined protocol page <u>to a user for performing work on the task</u> because a software application can generate variables without presenting a page to a user for performing work on a task. Moreover, the section of Brandt relied upon by the Examiner to reject claim 34 is limited to HTML templates including variables, and values for the variables being requested from a software application. The software application can generate values for the variables. However, this does not in any way teach <u>presenting a page to a user for the user to perform work on a task</u> because there is no teaching of a page being presented to a user <u>for the user to perform work on a task</u>.

Claims 4, 18, and 50 recite similar limitations of navigating the user to the predefined protocol page for performing work on the task. Because the prior art of record does not teach every claim limitation recited in dependent claims 4, 18, 34, and 50, the Office Action fails to establish a *prima facie* case of obviousness against these claims. Therefore, Applicants respectfully request that the Examiner withdraw the rejections of claims 4, 18, 34, 50, and their dependents (claims 5-16 and 35-48), which are in condition for allowance independently of their allowability based on their dependence from independent claims 1 or 31.

2. Claims 7, 21, 37, and 53

Claims 7, 21, 37, and 53 were rejected under 35 U.S.C. §103(a) as being unpatentable over Brandt in view of Click (pages 7 and 9 of the Office Action). In regards to claim 37, the Examiner relies upon col. 15, lines 3-23 of Brandt to reject the claim (page 7 of the Office Action). However, this section of Brandt does not contain any teaching or suggestion of the claim limitation of the new instance of the process template <u>defining a specific set of tasks</u>. Claim 37 recites:

> 37.   The method of claim 36 and further comprising the step of receiving a predefined process template identification from the at least one control page, and invoking at least one of the first and second objects to initiate a new instance of a process template in the workflow management system corresponding to the process template identification<u>, wherein the new instance of the process template defines a specific set of tasks</u>. (Emphasis added.)

The section of Brandt cited by the Examiner against claim 37 teaches only that requested data is generated by software applications 342 and returned to a gateway 332, which then substitutes HTML variables of HTML templates with the data generated by the software applications 342. The generated data is then provided as output data to a web browser 212 (col. 15, lines 3-14). The generated data of Brandt merely includes values generated for the associated HTML variables and does not <u>define a specific set of tasks</u>. The

simple outputting of requested variable values to a web browser in the form of an HTML template does not in any way teach a new instance of a process template <u>defining a specific set of tasks</u>, as recited in claim 37. Claims 7, 21, and 53 each recites similar limitations to that of claim 37, namely: the new instance of the process template defines a specific set of tasks. Because the prior art of record does not teach every limitation of dependent claims 7, 21, 37, and 53, the Office Action fails to establish a *prima facie* case of obviousness against these claims. Therefore, Applicants respectfully request that the Examiner withdraw the rejections of claims 7, 21, 37, and 53, as well as their respective dependent claims (claims 8-16, 22, 38-48, and 54), which are in condition for allowance independently of their allowability based on their dependence from claims 1 or 31.

3. Claims 15, 29, 47, and 63

Claims 15, 29, 47, and 63 were rejected under 35 U.S.C. §103(a) as being unpatentable over Brandt in view of Click (page 9 of the Office Action). With respect to claim 47, on page 9 of the Office Action the Examiner interprets a reservation confirmation template of Brandt to read on the notifications page recited in the claim. In Applicants' previous Response filed July 1, 2004, Applicants pointed out that even if the reservation confirmation template of Brandt somehow read on the claimed notification page, the Office Action still failed to cite any support for the other pages recited in claim 47. The Examiner responded by interpreting claim 47 in a manner such that demonstrating art for just one of the listed limitations would be sufficient (page 3 of the Office Action). Applicants respectfully disagree with the Examiner's interpretation of claim 47. Claim 47 recites:

> 47. The method of claim 45 wherein the at least one control page comprises a page selected from <u>a group consisting of</u> a worklist page, a process instance page, a process template page, a work item control page, a filter control page, and a notifications page. (Emphasis added.)

The Examiner's interpretation of claim 47 considers only the claimed notifications page but fails to consider <u>the group</u> of pages as claimed. Brandt and Click do not teach or suggest <u>the group</u> of pages as claimed. Accordingly, the Office Action fails to establish a *prima facie* case of obviousness against claim 47.

Claims 15, 29, and 63 recite similar claim limitations of a group consisting of a worklist page, a process instance page, a process template page, a work item control page, a filter control page, and a notifications page. Therefore, Applicants respectfully request that the Examiner withdraw the rejections of claims 15, 29, 47, and 63, which are in condition for allowance independently of their patentability based on any intervening base claims.

4. Claims 71-72

Claims 71 and 72 were rejected under 35 U.S.C. §103(a) as being unpatentable over Brandt in view of Click (page 9 of the Office Action). The Examiner relies upon col. 15, lines 3-23 of Brandt to reject claim 72. However, this section of Brandt is limited to teaching receiving requests for data from a web browser, generating responsive data with software applications 342, and substituting the generated data for HTML variables to be output to the web browser. This is merely an HTML template for exchanging data values from a software application to a web browser. The simple exchange of data values between a software application and a web browser cannot reasonably be interpreted to read on the limitations of claim 72, which recites:

> 72. The method of claim 31 and further comprising the steps of:
> directing the user to a user interface filter page;
> receiving filter parameters via the user interface filter page;
> invoking at least one of the first and second objects to filter a work list
> with the workflow management system.

Brandt contains absolutely no teaching of a <u>filter page</u>, <u>filter parameters</u>, or objects invoked to <u>filter a work list</u>. Moreover, Brandt does not even mention the word "filter." Again, Brandt's HTML templates are nothing more than means for providing requested variable values to a web browser. Applicants respectfully submit that the prior art of record does not teach the "filter" limitations recited in claim 72 and that the Office Action fails to establish a *prima facie* case of obviousness against claim 72. Claim 71 recites similar claim limitations of a filter page, filter parameters, and object for filtering a work list. Therefore, Applicants respectfully request that the Examiner withdraw the rejections of claims 71 and 72, which are patentable independently of their allowability based on their dependence from claims 1 or 31.

5. Claims 3, 17, 33, and 49

Claims 3, 17, 33, and 49 were rejected under 35 U.S.C. §103(a) as being unpatentable over Brandt and Click in view of Smith (pages 13 and 14 of the Office Action). With respect to claim 33, the Examiner admits on pages 13 and 14 of the Office Action that Brandt and Click fail to teach the claim limitation of "invoking at least one of the first and second objects to record lock a task in the workflow management system corresponding to the work item identification and permit exclusive access by a user to the task identified by the work item identification by checking out the task to the user for the user to work on the task." The Examiner then relies upon Smith to reject this claim limitation. However, Smith fails to disclose all elements of this claim limitation. For example, Smith's teaching of a record lock

is directed to "writes" to a shared storage device. In other words, Smith is concerned only with electronic data storage methods and does not contain any teaching related to a task, much less any teaching related to record locking a task in a workflow management system, as recited in claim 33. Moreover, Smith contains no teaching of invoking a first and/or second object to record lock a task. Still further, Smith does not teach or suggest checking out the task to the user for the user to work on the task. The Examiner's interpretation of Smith improperly attempts to expand Smith beyond the disclosed data storage domain and into a workflow management system, even though Smith does not contain any teaching of a workflow management system. As admitted by the Examiner, neither Brandt nor Click cures the deficiencies of Smith. Because the cited prior art of record does not teach or suggest every limitation of claim 33, the Office Action fails to establish a *prima facie* case of obviousness against claim 33 (MPEP 2143). Claims 3, 17, and 49 recite similar claim limitations of invoking at least one of the first and second objects to record lock a task in the workflow management system corresponding to the work item identification and permit exclusive access by a user to the task identified by the work item identification by checking out the task to the user for the user to work on the task. Therefore, Applicants respectfully request that the Examiner withdraw the rejections of claim 3, 17, 33, and 49, which are in condition for allowance independently of their allowability based on their dependence from independent claims 1 or 31. Claims 4-16, 18, 34-38, and 50 are also in condition for allowance as dependents of claims 3, 17, 33, and 49 respectively.

CONCLUSION

All objections and rejections have been addressed. In view of the above, each of the presently pending claims in this application is believed to be in condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue. It is believed that any fees associated with the filing of this paper are identified in an accompanying transmittal. However, if any additional fees are required, they may be charged to Deposit Account 07-2347. To the extent necessary a petition for extension of time under 37 C.F.R. § 1.136(a) is hereby made, the fee for which should be charged to the aforementioned deposit account.

Respectfully submitted,

Dated: February 22, 2005   By_____

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